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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In Re:

THANE JOSEPH BRERETON, JR.

STEPHANE J. BRERETON

Debtor(s).

Case No.: 17-30714

Chapter: 13

Filed Electronically

OBJECTION TO TRUSTEE'S MOTION TO DISMISS FOR NON-COMPLIANCE WITH CONFIRMATION ORDER

Debtor(s), through counsel Justin M. Myers, Attorney at Law, LLC, respectfully object to the Trustee's Motion to Dismiss for Non-compliance with Confirmation Order and move the Court to abate the Chapter 13 payments and modify the Chapter 13 Plan pursuant to 11 USC 1325 and

Rule 3015(g). In support of this objection, Debtor(s) assert the following:

- 1. Debtor(s) request an abatement of \$1,400.00 as payments due through January 25, 2019.
- 2. The following factors caused Debtor(s) to fall behind on the Chapter 13 plan payments:
 - a. Debtor had some temporary financial setbacks due to some unexpected medical expenses.
- 3. Debtor(s) seek to modify the plan payment as necessary to maintain feasibility of the Chapter 13 plan.
- 4. Debtor(s) are confident they will be able to make future plan payments on-time.

WHEREFORE, the Debtor(s) respectfully request an abatement be granted, the Trustee's Motion to Dismiss be denied and Debtor(s)' Motion to Modify Plan be granted.

DATED: February 11, 2019 /s/ Justin Myers

Attorney for Debtor(s)